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| 16 | Attorneys for Plaintiffs and the Proposed Classes | | |
| 17 | UNITED STATES DI | ISTRICT COURT | |
| | NORTHERN DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA SAN FRANCISCO DIVISION | | |
| 18 | SAN FRANCISC | O DIVISION | |
| 19 | JOHN DOE 1, JOHN DOE 2, JOHN DOE 3, JOHN DOE 4, JOHN DOE 5, JOHN DOE 6, | Case No. 3:22-CV-01559-LB | |
| 20 | JOHN DOE 7, JOHN DOE 8, JOHN DOE 9, | NOTICE RE: PLAINTIFFS' | |
| 21 | JOHN DOE 10, JOHN DOE 11, and JOHN DOE 12, individually and on behalf of all | ADMINISTRATIVE MOTION TO PROCEED ANONYMOUSLY | |
| 22 | others similarly situated, | | |
| 23 | Plaintiffs, | | |
| 24 | v. | | |
| 25 | NATIONAL COLLEGIATE ATHLETIC ASSOCIATION, THE UNIVERSITY OF SAN | | |
| | FRANCISCO, ANTHONY N. (AKA NINO) | | |
| 26 | GIARRATANO, and TROY NAKAMURA, | | |
| 27 | Defendants | | |
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TO THE COURT, DEFENDANTS, AND ATTORNEYS OF RECORD:

Plaintiffs hereby request a hearing on their administrative motion, made pursuant to Local Rule 7-11, for Plaintiffs John Does 4 through 12 to proceed in this case anonymously. ECF No. 53. Though the Court previously granted this request as to John Does 1, 2, and 3, ECF No. 14, Defendant University of San Francisco ("USF") has now opposed this motion, ECF No. 55, and Defendants Anthony N. Giarratano and Troy Nakamura (the "Coach Defendants") have now withdrawn their prior stipulations to the motion, ECF Nos. 56, 57. Given the serious nature of these issues, and to the extent the Court is inclined to credit any of the arguments raised in USF's opposition, then Plaintiffs respectfully request an opportunity to respond to those arguments in a brief reply brief and/or at a hearing on the administrative motion. Plaintiffs' counsel can be available for a hearing at the Court's convenience.

Separately, Plaintiffs intend to file a motion for a protective order to address their serious concerns that the Coach Defendants intend to broadly disseminate the true identities of the Plaintiffs. *See* ECF Nos. 56, 57. *See also, e.g., J.C. v. Choice Hotels Int'l, Inc.*, No. 20-cv-155-WHO, 2021 WL 1146406 (N.D. Cal. March 4, 2021) (granting plaintiff's motion to proceed under a pseudonym, and granting motion for protective order requiring witnesses to sign an agreement that the plaintiff's identity will be protected and not disseminated before defendants are permitted to disclose the plaintiff's identity).

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Dated: August 24, 2022 Respectfully submitted,

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By: /s/ Jonathan Selbin

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Jonathan Selbin (Cal. Bar No. 170222) iselbin@lchb.com

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NOTICE RE: ADMIN MOTION TO PROCEED ANONYMOUSLY CASE NO. 3:22-CV-01559-LB

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| | NOTICE RE- ADMIN MOTION TO |

NOTICE RE: ADMIN MOTION TO PROCEED ANONYMOUSLY CASE NO. 3:22-CV-01559-LB

| 1 | <u>CERTIFICATE OF SERVICE</u> | | |
|---------------------------------|--|---|--|
| 2 | I hereby certify that on August 24, 2022, I electronically filed the foregoing with the Clerk | | |
| 3 | of the Court using the CM/ECF system, which will send notification of such filing to all counsel | | |
| 4 | of record who receives CM/ECF notification. | | |
| 5 | | | |
| 6 | DATED: August 24, 2022 | /s/ Jonathan Selbin | |
| 7 | | Jonathan Selbin | |
| 8 | | LIEFF CABRASER HEIMANN & BERNSTEIN, LLP | |
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